

United States District Court  
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

Case Number:

V.

10-my-63 FLN

- (1) BENJAMIN GARDUWAR KARBEDEH  
(2) TIMOTHY SEWRO BOE  
(3) SYLVESTER RICHARDS GAYEKPAR

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. Between on or about February 1, 2010 and February 18, 2010 in Hennepin County, in the State and District of Minnesota defendants did knowingly conspire, with intent to defraud, to pass, utter, publish and sell an altered obligation or other security of the United States

in violation of Title 18, United States Code, Section(s) 371 and 472.

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

2/19/10 8:20 PM

Date

The Honorable Franklin L. Noel  
UNITED STATES MAGISTRATE JUDGE

Name &amp; Title of Judicial Officer

at

Minneapolis, MN

City and State

Signature of Judicial Officer



Signature of Complainant

Lawrence Chung Propes

Secret Service

SCANNED

FEB 22 2010

U.S. DISTRICT COURT MPLS

STATE OF MINNESOTA     )  
                                      )  
COUNTY OF HENNEPIN    )

SS. LAWRENCE CHUNG PROPES

Your Affiant, Lawrence Chung Propes, having been first duly sworn under oath hereby states the following is true and correct to the best of my knowledge:

1. I am a Special Agent ("S/A") of the United States Secret Service and have been so employed since December 2002. I am assigned to the Minneapolis Field Office of the United States Secret Service. I have received specialized training as a federal criminal investigator at the Federal Law Enforcement Training Center in Brunswick, Georgia, and completed the Special Agent Training Course at the Secret Service Training Academy. My responsibilities include the investigation of federal offenses including, but not limited to, violations involving financial crimes, wire fraud, bank fraud, computer fraud, telemarketing fraud, counterfeit U.S. currency and counterfeit securities.

2. This affidavit is based upon your affiant's training, experience, personal knowledge and observations in this investigation and upon his discussions with other law enforcement officers and agents directly involved in this investigation. Further, this affidavit contains information to support probable cause but is not intended to convey all of the facts of the entire investigation.

3. Your affiant is familiar with a fraudulent scheme often referred to as a "Black Money Scam," whereby victims are shown U.S. currency covered in a black substance. Perpetrators of the fraud will claim they have substantial amounts of cash similarly "blackened." Perpetrators will claim that only a very expensive chemical can remove the black substance to "clean" the U.S. currency. They will offer a percentage of the cleansed currency in exchange for money needed to buy the expensive chemical. These

perpetrators typically will perform a demonstration of the cleaning process, which often entices unsuspecting victims to give money to the perpetrator to buy the "cleaning" chemical.

4. Based on my previous knowledge of these types of fraud schemes and the facts below, your affiant has probable cause to believe that between February 1, 2010 and February 18, 2010, BENJAMIN GARDUWUR KARBEDEH, TIMOTHY SEWRO BOE, and SYLVESTER RICHARDS GAYEKPAR knowingly conspired, with intent to defraud, to pass, utter, publish and sell an altered obligation or other security of the United States through a Blackened Money Scam, in violation of Title 18, United States Code, Sections 371 and 472.

5. On or about December 1, 2009, KARBEDEH, YOUSEPH IDRIS, and GAYEKPAR were stopped and identified by the Missouri State Highway Patrol near Cameron, Missouri, for a traffic violation. Missouri State Highway Patrol recovered \$44,800 and evidence of a black money scheme, including a suitcase containing black paper cut to the size of genuine U.S. currency and covered with a white, powdery substance, along with a bottle of reddish-brown liquid believed to be iodine. Missouri State Highway Patrol then contacted the Kansas City Field Office of the U.S. Secret Service for assistance. YOUSEPH IDRIS was convicted in the District of Minnesota in March of 2004 for his involvement in a black money scheme. SYLVESTER GAYEKPAR was convicted in the District of Minnesota in October of 2005 for his involvement in a black money scheme.

6. On or about February 1, 2010, an individual later identified as BENJAMIN KARBEDEH approached a Drug Enforcement Agency Confidential Informant (CI) and

expressed an interest in buying a car that the CI was driving. The CI explained that his/her car was not for sale. BENJAMIN KARBEDEH and the CI exchanged telephone numbers and BENJAMIN KARBEDEH gave the CI a white envelope which contained a \$20 genuine Federal Reserve Note (FRN).

7. Later that day, BENJAMIN KARBEDEH telephoned the CI and asked him/her what he/she thought was in the envelope. The CI expressed an interest in the \$20 genuine note and BENJAMIN KARBEDEH explained that he had a process in which he could double whatever money the CI provided to him.

8. On or about February 3, 2010, BENJAMIN KARBEDEH, an individual later identified as TIMOTHY BOE, and the CI met in a monitored meeting, under the direction of the Hennepin County Sheriff's Office Violent Offenders Task Force. During this meeting, BENJAMIN KARBEDEH and TIMOTHY BOE demonstrated a procedure whereby they took a genuine \$100 (FRN) provided by the CI and placed the genuine note between two pieces of black paper the same size as the \$100 FRN. These two pieces of black paper were randomly selected from a large stack of like-sized, black pieces of paper provided by KARBEDEH and BOE. KARBEDEH and BOE placed these notes in a piece of aluminum foil containing red liquid, and wrapped them up tightly. They then told the CI that he/she had to stand on them for 15 minutes to pass the impression of the genuine note to the black paper. BENJAMIN KARBEDEH and TIMOTHY BOE then opened the foil package and placed the genuine note and the two black pieces of paper in a cup with some clear liquid that KARBEDEH and BOE had brought with them. They then washed the black pieces of paper, removing the black substance and fully exposing two additional genuine \$100 FRNs. KARBEDEH and BOE returned to the CI the

genuine note he/she originally provided them along with and one of the washed genuine \$100 FRNs. KARBEDEH and BOE retained the other washed \$100 FRN. KARBEDEH and BOE again explained they would double whatever money the CI brought to them.

9. On or about February 11, 2010, BENJAMIN KARBEDEH, TIMOTHY BOE and the CI met in a monitored meeting whereby KARBEDEH and BOE explained to the CI that he/she would need to bring \$50,000 and a safe to them in order for them to double his/her money. KARBEDEH and BOE explained to the CI that they planned to put the genuine \$50,000 provided from the CI in the safe with \$100,000 worth of the blackened paper, purported to be obscured genuine currency, that they had previously displayed. The safe would then be locked and KARBEDEH and BOE would keep the key to the safe and the CI would keep the key to the hotel room where this meeting would take place. As they described the plan to the CI, the next day KARBEDEH and BOE would return to the hotel room, meet the CI and together the three of them would wash the money as before. The CI told BENJAMIN KARBEDEH and TIMOTHY BOE that they would not be allowed to depart with his/her \$50,000 until the CI received the money that KARBEDEH and BOE promised. KARBEDEH and BOE explained again that as long as the CI brought them \$50,000, they would convert it into an additional \$100,000. KARBEDEH and BOE told the CI that he/she could then keep the original \$50,000 and the newly-washed \$50,000 while they would keep the remaining newly-washed \$50,000.

10. After the above meeting, KARBEDEH was observed by law enforcement officers to drive away, along with two unidentified passengers, in a green Toyota Camry, Minnesota License Plate #PGM-472. The vehicle's registered owner is TIMOTHY BOE,

10972 Crane Street Northwest, Coon Rapids, Minnesota. Law enforcement officers monitored the vehicle until it turned onto 110<sup>th</sup> Street near the intersection of Crane Street, Coon Rapids, MN.

11. On February 18, 2010, BENJAMIN KARBEDEH, TIMOTHY BOE and the CI met in a monitored meeting in room 544 of the Comfort Inn Hotel, 1321 East 78<sup>th</sup> Street, Bloomington, Minnesota. During this monitored meeting, BENJAMIN KARBEDEH and TIMOTHY BOE once again demonstrated the conversion procedure whereby they took three genuine \$100 FRNs provided by the CI and placed each genuine note between two pieces of black paper, just as they had done during the February 3, 2010 meeting. Once again, KARBEDEH and BOE placed these notes in aluminum foil with a red liquid and wrapped them tightly then told the CI to leave this package under the leg of the table until they returned with additional black paper and chemical cleansing solution. BENJAMIN KARBEDEH and TIMOTHY BOE then departed the Comfort Inn Hotel.

12. BENJAMIN KARBEDEH and TIMOTHY BOE were observed by law enforcement officers leaving the Comfort Inn Hotel and entering the green Toyota Camry bearing MN License #PGM-472. This vehicle was driven by a third individual later identified as SYLVESTER GAYEKPAR. Law enforcement officers monitored this vehicle as it drove toward 110<sup>th</sup> Street near Crane Street in Coon Rapids, MN. A short time later, the vehicle re-emerged from the 110<sup>th</sup> Street/Crane Street neighborhood and was followed by law enforcement back to the Comfort Inn in Bloomington. Upon arriving back at the Comfort Inn, BENJAMIN KARBEDEH and TIMOTHY BOE exited

the vehicle carrying a large black suitcase. The driver, SYLVESTER GAYEKPAR, remained in the vehicle, parked in the southwest area of the Comfort Inn parking lot.

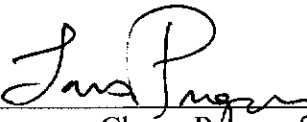
13. BENJAMIN KARBEDEH and TIMOTHY BOE returned to room 544 of the Comfort Inn Hotel, Bloomington, Minnesota, and again met with the CI. This meeting was again monitored by law enforcement. BENJAMIN KARBEDEH and TIMOTHY BOE removed the package from the table leg, then opened the foil package and proceeded to wash the black pieces of paper, fully exposing six genuine \$100 FRNs, thus giving the impression that new \$100 FRNs were created from this chemical conversion process. KARBEDEH and BOE then returned to the CI the three genuine \$100 FRNs, that he/she had earlier provided and three of the newly-washed genuine \$100 FRNs. KARBEDEH and BOE kept the other three newly-washed FRNs. The CI then removed a black Reebok duffle bag from underneath a nightstand and removed \$50,000 in genuine FRNs wrapped in five \$10,000 bundles, while KARBEDEH and BOE prepared the hotel room. BENJAMIN KARBEDEH and TIMOTHY BOE then unrolled pieces of aluminum foil and covered the topside of a nearby desk with the aluminum foil. KARBEDEH and BOE then placed a white powdery substance on top of the aluminum foil as they began to prepare to purportedly convert the \$50,000 genuine currency into an additional \$100,000 of genuine currency. BENJAMIN KARBEDEH then picked up one of the bundles of the money provided by the CI.

14. At this point, law enforcement officers converged on the room, arrested BENJAMIN KARBEDEH and TIMOTHY BOE, and seized the black suitcase brought back into the room by KARBEDEH and BOE and located additional black paper cut to the same size of United States currency along with materials necessary to perform the

black money scheme conversion. SYLVESTER GAYEKPAR was arrested outside the hotel sitting in the parked Toyota Camry.

15. Based upon the above information, your affiant submits that there is probable cause to believe that between February 1, 2010 and February 18, 2010, BENJAMIN GARDUWUR KARBEDEH, TIMOTHY SEWRO BOE, and SYLVESTER RICHARDS GAYEKPAR knowingly conspired, with the intent to defraud, to pass, utter, publish, or sell, an altered obligation or other security of the United States, all in violation of Title 18, United States Code, Sections 371 and 472.

Further your Affiant sayeth not.

  
\_\_\_\_\_  
Lawrence Chung Popes, Special Agent  
United States Secret Service

SUBSCRIBED and SWORN to before me this  
19<sup>th</sup> day of February, 2010.

  
\_\_\_\_\_  
THE HONORABLE FRANKLIN L. NOEL  
UNITED STATES MAGISTRATE JUDGE